

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

PNC BANK, N.A.,

Plaintiff,

vs.

HEYER-MURPHY, LLC and STEPHEN
C. MURPHY,

Defendants.

CAUSE NO. 4:12-CV-01368-JAR

RECEIVER'S MOTION TO APPROVE COSTS

COMES NOW First Rockford Group, Inc., by and through the undersigned counsel, and states as follows for its Motion to Approve Costs:

1. On August 22, 2013, Receiver First Rockford Group, Inc. filed and served its July 2013 Report of Receiver to Plaintiff PNC Bank, N.A. and Defendants Heyer-Murphy, LLC, Stephen C. Murphy. [DOC## 48 & 48-1]

2. In said July 2013 Report, the Receiver identified certain portions and areas of the roof of the subject property commonly known as 5035 26th Avenue, Rockford, Illinois (the "Property") needing repairs.

3. The Receiver attached as Exhibit "A" to the July 2013 Report a copy of an inspection report prepared by Roofworks identifying the various costs of labor and material, including the description of the work needed to repair the roof on the Property. [DOC# 48-1]

4. Neither Plaintiff nor Defendants have objected to any portion of the Receiver's July 2013 Report, and none have challenged the inspection report and cost estimates prepared by Roofworks.

5. The repairs to the roof of the Property are necessary to prevent further water intrusion into the Property and to preserve the assets that are the subject of these proceedings.

WHEREFORE, First Rockford Group, Inc., the Receiver in the above-captioned cause, respectfully requests the Court to enter an order approving the costs of the repairs identified in the Receiver's July 2013 Report and the attached Exhibit "A", and granting such other relief the Court deems just and proper under the circumstances.

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CERTIFICATE OF SERVICE

The undersigned hereby certified that a true and correct copy of the foregoing document was served by electronic service through the ECF system on all counsel of record on this 11th day of September 2013:

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